

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

FRANCHISE GROUP, INC.,<sup>1</sup>

Reorganized Debtor.

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)  
) Chapter 11  
)

) Case No. 24-12480 (LSS)  
)

) (Jointly Administered)  
)

) **Objection Deadline:**  
) **August 5, 2025 at 4:00 p.m. (ET)**  
)

) **Hearing Date:**  
) **August 19, 2025 at 10:00 a.m. (ET)**  
)

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that the above-captioned debtor (the “Reorganized Debtor”) and Freedom VCM Holdings, LLC (“TopCo” and together with the Reorganized Debtor, the “Reorganized Debtors”) have filed the *Reorganized Debtors’ Motion for Entry of a Final Decree and Order Closing the Chapter 11 Case of Freedom VCM Holdings, LLC* (the “Motion”)<sup>2</sup> with the United States Bankruptcy Court for the District of Delaware (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that any objections to the Motion must be filed on or before **August 5, 2025, at 4:00 p.m. (prevailing Eastern Time)** (the “Objection Deadline”) with the United States Bankruptcy Court for the District of Delaware, 3<sup>rd</sup> Floor, 824 North Market Street, Wilmington, Delaware 19801. At the same time, you must serve a copy of any objection upon the undersigned counsel to the Reorganized Debtors so as to be received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE MOTION IS SCHEDULED TO BE HELD ON AUGUST 19, 2025, AT 10:00 A.M.**

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<sup>1</sup> The last four digits of Franchise Group, Inc.’s federal tax identification number are 1876. The mailing address for Franchise Group, Inc. is 2371 Liberty Way, Virginia Beach, Virginia 23456. For purposes of this Motion, the terms “Reorganized Debtors” or “Debtors” (as defined below), as applicable, also include certain reorganized debtor affiliates, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Reorganized Debtors’ claims and noticing agent, at <https://cases.ra.kroll.com/FRG/>. All of the motions, contested matters, and adversary proceedings that remained open as of the closing of any of the Reorganized Debtors’ cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Franchise Group, Inc., Case No. 24-12480 (LSS).

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion or in the *Ninth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates* [Docket No. 1454] (the “Plan”), as applicable.

**(PREVAILING EASTERN TIME)** BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN IN THE BANKRUPTCY COURT, 824 N. MARKET STREET, 6TH FLOOR, COURTROOM NO. 2, WILMINGTON, DELAWARE 19801.

**PLEASE TAKE FURTHER NOTICE THAT, IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR A HEARING.**

Dated: July 28, 2025  
Wilmington, Delaware

/s/ Allison S. Mielke

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